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EXHIBIT A

EXHIBIT A.1	STAVRINIDES
EXHIBIT A.2	PETERSON
EXHIBIT A.3	MUSGROVE
EXHIBIT A.4	BUSENBARK
EXHIBIT A.5	AVATAR
EXHIBIT A.6	CRUZ

Ronald Cupp  
150 Raley Town Center Ste 2512  
Rohnert Park, California [94928]  
Telephone: (707) 318-9929  
Plaintiff in Pro Se

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Ronald Cupp	)	CASE NO:
	)	
Plaintiff,	)	DECLARATION OF:
	)	
vs.	)	ELIAS STAVRINIDES
	)	
COUNTY OF SONOMA;	)	In support of:
ANDREW SMITH, Individually;	)	CUPP V SONOMA COUNTY
TODD HOFFMAN, Individually;	)	
TYRA HARRINGTON, Individually;	)	
MARK FRANCESCHI, Individually;	)	
TENNIS WICK, Individually;	)	
MICHAEL KING, Individually;	)	
ANTHONY CINQUINI, Individually;	)	
CINQUINI & PASSARINO, INC.;	)	
DOES 1-20	)	
	)	
Defendants.	)	

I, ELIAS STAVRINIDES declare as follows:

July 3, 2019, I was inside my house at 970 Butler Avenue, Santa Rosa, CA and heard a strange buzzing noise that I recognized to be a drone. I came outside and saw one flying over the neighbor's yard that's fenced off from mine, on the same property but a different backyard. So I

**EXHIBIT A.1**

1 walked around, and my neighbor had a couple of people working in the garden. And I asked them  
2 what was going on, and everybody was frazzled, saying that there was a drone flying the property.

3  
4 I observed the drone flying inside of a corridor of eucalyptus trees that had some  
5 greenhouses, and it was flying right over the top of the greenhouses and down the aisle. There  
6 was four and four greenhouses that faced each other, and it was flying down the roadway  
7 between them about, I would say, 12, 14 feet off the ground. And then it rose maybe 60 feet up  
8 over the eucalyptus trees and then dropped back down right over our head. The thing was so  
9 close that I was looking around for a piece of PVC pipe that was sitting on the ground to try and  
10 smack it out of the sky. I was pretty agitated by the trespass and my invasion of privacy. It just  
11 seemed very offensive to be flying over that close and to be scanning the property.

12 So it followed a little pattern along some hoop houses that were covered in shade cloth.  
13 And then one of the girls that worked for the neighbor was pregnant, and she came walking up,  
14 and she was visibly shaken. So she was saying, "Hey, what's going on? What is this all about?"  
15 And I said, "I have no idea." But I was so focused on trying to smack this thing with a stick of  
16 PVC. So it did fly up again and over the house. I would say the house is 20 to 25 feet tall. Went  
17 onto the other side of the eve of the roof, flew around and then rose back up over the roof of the  
18 house and dropped back down again right over our head.

19  
20 At that point, everyone was starting to get a little bit on the panicky side, and a few  
21 people said that they were going to take off. They got in their cars and left. From that point, I just  
22 tracked it flying around the property for a while. I would say this went on for 15 to 30 minutes  
23 total from it popping up and down and going around the property doing its little flight path. And  
24 then from that point, it rose up over some trees, and I lost sight of it, and it flew away.

25 I experienced a little bit of fear because you don't know who's looking. I don't have the  
26 ability to see what it could see. And it just was really, really aggravating to me. It just felt like a  
27 violation of my privacy. I was actually in shorts and flip flops, no shirt. And it just felt like I was  
28 lounging around my backyard and had somebody just staring at me with binoculars basically,

1 because it's a hard feeling to describe, to have somebody spying on you in that way. I was pretty  
2 angry and felt violated and actually considered looking up drone jammers and all kinds of things  
3 that I guess are not legal for us to own.

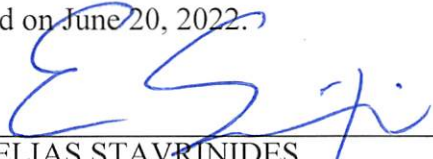
4 This was witnessed by myself and John Buzenberg, Kelli Peterson, the pregnant lady and  
5 her kids, and a Ronnie Saunders.

6 I was attacked later and my property raided by the Tyra Harrington and the Sonoma  
7 County Code Enforcement Officers of the PRMD, and they used this drone exhibits as their  
8 probable cause to get the inspection warrant without telling the Judge it was taken without  
9 permission or a warrant. Their Code Enforcement Officer Lee represented on the Affidavit of  
10 Probable Cause to the Judge that these exhibits are part of the Google Earth images. I discovered  
11 this because I was included in a civil suit SCV255109, without any administrative hearings or  
12 due process, and this information came out that the drone operator was a man named Anthony  
13 Cinquini hired by Sonoma County PRMD.  
14  
15

16 I have personal knowledge of all facts stated in this declaration, and if called to testify, I  
17 could and would testify competently thereto.  
18

19 I declare under penalty of perjury under the laws of the United States that the foregoing is  
20 true and correct and that this declaration was executed on June 20, 2022.  
21

22 Signature: \_\_\_\_\_

  
23 ELIAS STAVRINIDES  
24 970 BUTLER AVENUE  
25 SANTA ROSA, CA  
26 707-483-7689  
27  
28

1 Ronald Cupp  
150 Raley Town Center Ste 2512  
2 Rohnert Park, California [94928]  
Telephone: (707) 318-9929  
3 Plaintiff in Pro Se  
4  
5  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10

11 Ronald Cupp	) CASE NO:
	)
12 Plaintiff,	) DECLARATION OF:
	)
13 vs.	) KELLI PETERSON
	)
14 COUNTY OF SONOMA;	) In support of:
15 ANDREW SMITH, Individually;	) CUPP V SONOMA COUNTY
16 TODD HOFFMAN, Individually;	)
17 TYRA HARRINGTON, Individually;	)
18 MARK FRANCESCHI, Individually;	)
19 TENNIS WICK, Individually;	)
20 MICHAEL KING, Individually;	)
21 ANTHONY CINQUINI, Individually;	)
22 CINQUINI & PASSARINO, INC.;	)
DOES 1-20	)
	)
23 Defendants.	)
	)

24 I, KELLI PETERSON declare as follows:

25 On or about July 3, 2019, I was at a property located at 970 Butler Avenue, Santa Rosa. I  
26 was working a morning shift. I was there pretty early, and we started hearing a buzzing noise. I  
27 walked out to the front where the house is to stretch my hamstring. So, I was laying down, facing  
28 up. I think I was five months pregnant.

1 I was laying down, looking up, and I kept hearing the buzzing sound, and Demir (my co  
2 worker) came out from the back and said that there's a drone. And I said, really?, that's what that  
3 buzzing sound is? And as I looked up into the sky, it flew over where I was. And it was about as  
4 high as one of those lights that are overhead the street. So I don't know if that's 20 or 25 feet, but  
5 somewhere between 20 and 25 feet right above my head. And that wasn't the only time that it  
6 was over our head too. I got up and we kind of looked around to see if there was maybe a  
7 neighbor or somebody being annoying, like a neighbor kid or something.  
8

9 We went back into the other sections behind the house. And then, that drone kept  
10 following us around and buzzing over our heads even lower than that. I'd say more like 15 to 20  
11 feet. So close that we could throw rocks at it. So, I started trying to throw rocks at it because it  
12 was getting annoying at this point. So, it was about, I think, three different moments where that  
13 drone was so close to us that it could be hit with a rock by me, a five month pregnant woman.  
14

15 I would come and hover over us at least for one to two minutes, and then it would go fly  
16 off somewhere else. And then, it would kind of come back around the perimeter, and then it  
17 would come back down really close to us. So, I actually thought that maybe there was some  
18 adolescent boy around trying to play a joke on us or tease us or something.  
19

20 There was a shade house that was even lower than greenhouses. There was a tin covering  
21 on the side. It was just a few feet higher than that. So, it was coming down and looking in there.  
22 The two or three times it was over my head, was in the side yard and in the back where the shade  
23 houses were.  
24

25 It was in the area for at least an hour where we could hear it, but the time of contact  
26 where it was above our heads or where we could try to throw a rock at it, was about 15 to 30  
27  
28

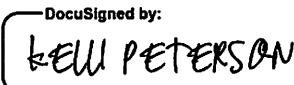
1 minutes total because at that point we were just like, what is this? It was almost like we were  
2 being attacked.

3 I was very scared and angry. At first, I thought it was a joke, and then I was feeling  
4 scared and angry, but we left. We went to go have lunch. We took a break because it felt like a  
5 very intrusive attack. So, my pregnant system was just very thrown off by that.

6  
7 It was after this that I discovered that this was done by Sonoma County.

8 I have personal knowledge of all facts stated in this declaration, and if called to testify, I  
9 could and would testify competently thereto.

10  
11 I declare under penalty of perjury under the laws of the United States that the foregoing is  
12 true and correct and that this declaration was executed on June 20, 2022.

13  
14 Signature:  DocuSigned by:  
15 KELLI PETERSON  
16 PO BOX 197, FAIRFAX, CA 94978  
17  
18  
19  
20  
21  
22  
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Ronald Cupp	)	CASE NO:
	)	
Plaintiff,	)	DECLARATION OF:
	)	
vs.	)	SEAN MUSGROVE
	)	
COUNTY OF SONOMA;	)	In support of:
ANDREW SMITH, Individually;	)	CUPP V SONOMA COUNTY
TODD HOFFMAN, Individually;	)	
TYRA HARRINGTON, Individually;	)	
MARK FRANCESCHI, Individually;	)	
TENNIS WICK, Individually;	)	
MICHAEL KING, Individually;	)	
ANTHONY CINQUINI, Individually;	)	
CINQUINI & PASSARINO, INC.;	)	
DOES 1-20	)	
	)	
Defendants.	)	

On June 14, 2022 I was at Carly Castagnola's property at 12778 DuPont Road in Sebastopol. At about 10:00 or 11:00 a.m., the County of Sonoma came out. A PRMD guy, a building inspector, with a drone operator. The County is trying to get Carly off her property, and they showed up with some County Officials. The PRMD officer and drone operator parked on



1 the neighbor's private property (without permission), and the PRMD officer directed the drone  
2 operator what to do. They flew the drone over the property in front of all the people there, it  
3 crossed over into the property above us, it flew the entire property taking it's time and everybody  
4 was upset.

5 This went on for approximately 20 minutes. I did not see it land so it may have been  
6 longer.  
7

8 It was very concerning to everyone, invasion of privacy while we were watching, the  
9 PRMD and drone operator not caring, it made us all very upset and angry that County Officials  
10 can do this to us. We all felt violated.  
11

12 I have personal knowledge of all facts stated in this declaration, and if called to testify, I  
13 could and would testify competently thereto.

14 I declare under penalty of perjury under the laws of the United States that the foregoing is  
15 true and correct and that this declaration was executed on June 20, 2022.  
16

17 Signature: \_\_\_\_\_

18 SEAN MUSGROVE  
19 PO BOX 5355  
20 NOVATO, CA  
21 707-771-5540  
22  
23  
24  
25  
26  
27  
28

1 Ronald Cupp  
 2 150 Raley Town Center Ste 2512  
 3 Rohnert Park, California [94928]  
 Telephone: (707) 318-9929  
 Plaintiff in Pro Se

4  
 5  
 6  
 7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10  
 11 Ronald Cupp ) CASE NO:  
 )  
 12 Plaintiff, ) DECLARATION OF:  
 )  
 13 vs. ) JOHN BUSENBARK  
 )  
 14 COUNTY OF SONOMA; ) In support of:  
 15 ANDREW SMITH, Individually; ) CUPP V SONOMA COUNTY  
 16 TODD HOFFMAN, Individually; )  
 17 TYRA HARRINGTON, Individually; )  
 18 MARK FRANCESCHI, Individually; )  
 19 TENNIS WICK, Individually; )  
 20 MICHAEL KING, Individually; )  
 ANTHONY CINQUINI, Individually; )  
 21 CINQUINI & PASSARINO, INC.; )  
 DOES 1-20 )  
 22 Defendants. )

23 I, JOHN BUSENBARK declare as follows:

24 I was living at a residence and on July 3<sup>rd</sup>, 2019 and that day a drone flew into our  
 25 residence in our backyard. It came up and over our house and then dropped down and hovered  
 26 for a little bit until it went off to explore the rest of the property.  
 27  
 28

1 It kept hovering about 10 to 12 feet off the ground. It made me extremely uncomfortable.  
2 There were 6 people there at the time and we all were freaking out.

3 It came down and then went through all the little alleyways and up and around the  
4 property at this low altitude.

5 It came through and then went low and slowed and was looking in the greenhouses, I am  
6 not sure if it was looking into the house windows or not.


7  
8 Then when it went down to look inside the greenhouses, it had to drop down lower to get  
9 inside the door.

10 I was extremely uncomfortable, angry, confused and felt my privacy was invaded.

11  
12 I have personal knowledge of all facts stated in this declaration, and if called to testify, I  
13 could and would testify competently thereto.

14  
15 I declare under penalty of perjury under the laws of the United States that the foregoing is  
16 true and correct and that this declaration was executed on June 20, 2022.

17  
18 Signature: \_\_\_\_\_

  
JOHN BUSENBARK  
90 JUANITA COURT,  
NOVATO, CA

Ronald Cupp  
150 Raley Town Center Ste 2512  
Rohnert Park, California [94928]  
Telephone: (707) 318-9929  
Plaintiff in Pro Se

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Ronald Cupp	)	CASE NO:
	)	
Plaintiff,	)	DECLARATION OF:
	)	
vs.	)	LEO AVATAR
	)	
COUNTY OF SONOMA;	)	In support of:
ANDREW SMITH, Individually;	)	CUPP V SONOMA COUNTY
TODD HOFFMAN, Individually;	)	
TYRA HARRINGTON, Individually;	)	
MARK FRANCESCHI, Individually;	)	
TENNIS WICK, Individually;	)	
MICHAEL KING, Individually;	)	
ANTHONY CINQUINI, Individually;	)	
CINQUINI & PASSARINO, INC.;	)	
DOES 1-20	)	
	)	
Defendants.	)	

I, LEO AVATAR declare as follows:

On or about June 8, 2020 I was served a warrant and was searched by Sonoma County  
PRMD, under the direction of Todd Hoffman working for Tyra Harrington.

1 I never saw the drone flying over my property, but my employees, tenants and /or  
2 caretakers of the property did and told me about it. It was not once, but several times. This was  
3 sometime around February or March of the same year.

4 I believe Todd Hoffman had reviewed some Google Images while working for the  
5 County of Sonoma. He had reviewed some satellite imagery, which is older imagery.

6  
7 I bought the property in 2017 and one of the first things I did when I got the property was  
8 actually planted a small orchard and garden area. And by garden, of course I mean vegetables  
9 and herbs, and so when he was reviewing the satellite imagery, which he included pictures of this  
10 in his reports, he saw what were newly planted, small baby fruit trees in a square pattern in rows,  
11 and I have the receipts.

12  
13 I have the people who helped me, in photographs of actually the planting of this orchard  
14 and all of the trees, which nursery they were purchased from and all of that.

15 So he, through the satellite imagery, assumed and was under the impression that that  
16 orchard was a cannabis farm or garden, and that was what inspired him to then do this work with  
17 the drone.

18  
19 And from what I understand, the drone was pre-warrant or search warrant of any kind,  
20 but was him trying to basically gather evidence or information to get a search warrant; which  
21 just, side note, is strange behavior, to me, from a code enforcement officer in the building  
22 department. This sounds like the work of a investigator. Police officer of some sort.

23  
24 So, anyways, when he saw the orchard, that was what inspired him to come back with the  
25 drone, and I don't remember or know exactly how high it was or where it was but I do know it  
26 specifically went to those areas, which is further into the interior of my property and is pretty far  
27  
28

1 from any of the other structures on my property, at least a thousand to 1,500 feet away, and my  
2 property in total is 43 acres so there's a lot of space between areas on the structures.

3 And what happened was when he arrived with the drone to inspect the fruit orchard, it  
4 became obvious and apparent that it was a fruit orchard and was not a cannabis cultivation site.

5 Whatever his reaction to this was, he probably was either feeling surprised or let down  
6 that it wasn't what he thought it was, and then it seems like proceeded to fly the drone around my  
7 property in an effort to try and maybe justify his actions or see what he could find, so pictures  
8 that he then included from the drone is what I use to come to understand that then on his way,  
9 leaving the property, he flew much closer to, and around, my barn; one of the barns on the  
10 property, and began taking pictures and photographs and looking around at this barn, at which  
11 point he noticed, and which he wrote in his report, that there was an air conditioner unit adjacent  
12 to the barn, the condenser part, which, just for the record, this barn was leased out to a tenant and  
13 had been leased out for over a year, and the tenant had done some improvements and changes to  
14 the building but nothing major.

15 Anyways, there was a air conditioning unit in a fenced area outside the building that  
16 could barely really be seen, but he must have been looking really close, and I'm not sure how  
17 close he got with the drone but from the pictures, you can tell he was trying really hard to get as  
18 close to the building as he could.

19 These photos show some of what he is talking about but he didn't include very many of  
20 them when he explains that there was an air conditioner unit outside the building, and he went on  
21 in his search warrant request to claim that commonly cannabis cultivation indoor uses air  
22 conditioner units, as one of his means to what later became an actual search warrant to the  
23 property.

1 So, he then writes in his report after getting this drone footage, that he went online  
2 through the county records and went through the county records, trying to see if there was a  
3 permit for the air conditioner, and he determined that no permit had been applied for and thus  
4 gave him, as a code enforcement officer, this understanding that this was an un-permitted  
5 installation and that that's more up his alley in regards to code enforcement and code violation.  
6 And he puts all that in his report, went to a Judge, and I think used that as more means to justify  
7 what became an eventual, no knock, full property search warrant. They came out with the  
8 Sheriff's Office, Fish and Wildlife, another agency I don't remember, and a couple of Code  
9 Enforcement Officers.

10  
11 I don't live on that property but that is my private property. I actually owned it outright.  
12 I've been a Sonoma county resident my entire life. I have been paying my taxes on my properties  
13 and, yeah, something about the way they came onto the property and the process of this was very  
14 shocking, and I actually was surprised.

15  
16 It felt like a violent intrusion of my privacy, and especially and particularly that Todd  
17 Hoffman himself took it upon himself to forcefully enter into doors on the property, that led to a  
18 small room that actually was windows all the way around and so he could clearly see that there  
19 was nothing in there.

20  
21 It was just some files and paper storage, but he took it upon himself to smash the doors in  
22 with a ramrod and continued to, yeah, deeply invade my privacy.

23  
24 I have personal belongings, I have valuable items and tools and things stored, that had  
25 nothing to do with anything that the tenant was doing in his building, but then they continued to  
26 walk around the entirety of the 43 acres, seeking violations that may or may not have existed,  
27 and more importantly, some things that existed from way prior to when I even owned the  
28 property.

1 He was going way out of his way to try and find anything that he could cite or fine me  
2 with violations on, even though they clearly had nothing to do with anything that they were there  
3 for, and some of them had been there for years and years prior to me even owning the land.

4  
5 It felt like a major violation of my rights and it made me want to move out of Sonoma  
6 County. It made me not want to be a property owner. It made me very discouraged and  
7 displeased with the entire county operation.

8 I have personal knowledge of all facts stated in this declaration, and if called to testify, I  
9 could and would testify competently thereto.

10  
11 I declare under penalty of perjury under the laws of the United States that the foregoing is  
12 true and correct and that this declaration was executed on July 22, 2022.

13  
14  
15 Signature: /s/ LEO AVATAR   
16 LEO AVATAR  
17 1645 Crane Canyon Road  
18 Santa Rosa, CA  
19 creationship@gmail.com  
20  
21  
22  
23  
24  
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Ronald Cupp  
150 Raley Town Center Ste 2512  
Rohnert Park, California [94928]  
Telephone: (707) 318-9929  
Plaintiff in Pro Se

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Ronald Cupp	)	CASE NO:
	)	
Plaintiff,	)	DECLARATION OF:
	)	
vs.	)	ANTHONIO GONZALEZ CRUZ
	)	
COUNTY OF SONOMA;	)	In support of:
ANDREW SMITH, Individually;	)	CUPP V SONOMA COUNTY
TODD HOFFMAN, Individually;	)	
TYRA HARRINGTON, Individually;	)	
MARK FRANCESCHI, Individually;	)	
TENNIS WICK, Individually;	)	
MICHAEL KING, Individually;	)	
ANTHONY CINQUINI, Individually;	)	
CINQUINI & PASSARINO, INC.;	)	
DOES 1-20	)	
	)	
Defendants.	)	

I, ANTHONIO GONZALEZ CRUZ declare as follows:

I was working on Ron Cupp's house at 4640 Arlington Avenue in Santa Rosa on 6-1-22,  
I was working on the house deck outside on the second floor at around 10:50 a.m. I heard a  
humming noise, like a lot of bees.

1 I look up and observe a drone. it's hovering probably a little higher than a telephone pole,  
2 20 feet away. It's hovering, there, probably for a good, maybe, minute or two. It's going in  
3 circles, just turning. Staying in place, but just turning.


4 It is at a height that it can observe me on the upper deck up close, as I said, working on  
5 the house deck, and can observe me and the inside the windows of the second floor and  
6 bathroom.

7 I video taped it for a minute hovering above me on the upper deck.

8 It made me feel uncomfortable, I was angry and felt violated. I did not know who was  
9 doing this or why, felt it was invading my privacy.

10 I have personal knowledge of all facts stated in this declaration, and if called to testify, I  
11 could and would testify competently thereto.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is  
13 true and correct and that this declaration was executed on June 20, 2022.  
14

15 Signature: 

16 ANTONIO GONZALEZ CRUZ  
17 116 Fernwood Court, Santa Rosa, CA  
18 Phone: 707-321-3711  
19  
20  
21  
22  
23  
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